

January 23, 2007

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: 2006 CPNI Compliance Certifications,

EB Docket No. 06-36, EB Docket No. EB-06-TC-060

Dear Ms. Dortch:

Enclosed are one (1) original and four (4) copies each of the 2006 compliance certificate and accompanying statement, explaining compliance with 47 C.F.R. §64.2009(e) or 47 C.F.R. §64.2001 et. seq., concerning customer proprietary network information ("CPNI") for the following wholly owned subsidiaries of Cavalier Telephone Corporation:

- Cavalier Telephone, LLC
- Cavalier Telephone Mid-Atlantic, LLC
- Elantic Telecom, Inc.
- Talk America, Inc.
- LDMI Telecommunications, Inc., and
- Network Telephone Corporation

Please contact me at 757.248.4160 or sperkins@cavtel.com if you have any questions.

Respectfully submitted,

Stephen T. Perkins General Counsel,

Cavalier Telephone Corporation

cc: Mr. Byron McCoy

(byron.mccoy@fcc.gov)

Telecommunications Consumers Division

Enforcement Bureau

Federal Communications Commission

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ORIGINAL

ANNUAL OFFICER'S CERTIFICATION OF CUSTOMER PROPIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

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I, Edward B. Meyercord, III, certify and state that:

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- 1. I am the Chief Executive Officer of Cavalier Telephone, LLC ("Cavalier Telephone") and have personal knowledge of Cavalier Telephone's operating procedures as they relate to Customer Proprietary Network Information ("CPNI"). and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
- 2. I hereby certify that, to the best of my knowledge, information and belief, Cavalier Telephone's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
- 3. A further statement outlining Cavalier Telephone's operating procedures and compliance is attached as Exhibit A, as required by 47 C.F.R. §64.2009(e).

Edward B. Meyercord, II

Chief Executive Officer

January 18, 2007

Exhibit A

Statement of CPNI Procedures and Compliance

Cavalier Telephone, LLC ("Cavalier Telephone") does not use or permit access to Customer Proprietary Network Information ("CPNI") to market any services outside of the total service approach as specified in 47 CFR §64.2005. If Cavalier Telephone elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Cavalier Telephone ensures that its employees do not improperly use or disclose CPNI by requiring that all access to CPNI be approved by a supervisor with knowledge of the FCC's CPNI requirements.

Cavalier Telephone has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to CPNI. Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission.

Cavalier Telephone maintains a record of all sales and marketing campaigns that use CPNI.

Cavalier Telephone maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

ANNUAL OFFICER'S CERTIFICATION OF CUSTOMER PROPIETARY NETWORK INFORMATION (CPNI) RECEIVED & INSPECTED

I, Edward B. Meyercord, III, certify and state that:

JAN 2 9 2007

- I am the Chief Executive Officer of Cavalier Telephone MCAMAIL ROOM ("Cavalier Telephone") and have personal knowledge of Cavalier Telephone's operating procedures as they relate to Customer Proprietary Network Information ("CPNI"), and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
- 2. I hereby certify that, to the best of my knowledge, information and belief, Cavalier Telephone's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
- 3. A further statement outlining Cavalier Telephone's operating procedures and compliance is attached as Exhibit A, as required by 47 C.F.R. §64.2009(e).

Edward B. Meyercord, III Chief Executive Officer

January 18, 2007

Exhibit A

Statement of CPNI Procedures and Compliance

Cavalier Telephone Mid-Atlantic, LLC ("Cavalier Telephone") does not use or permit access to Customer Proprietary Network Information ("CPNI") to market any services outside of the total service approach as specified in 47 CFR §64.2005. If Cavalier Telephone elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Cavalier Telephone ensures that its employees do not improperly use or disclose CPNI by requiring that all access to CPNI be approved by a supervisor with knowledge of the FCC's CPNI requirements.

Cavalier Telephone has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to CPNI. Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission.

Cavalier Telephone maintains a record of all sales and marketing campaigns that use CPNI.

Cavalier Telephone maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

ORIGINAL

ANNUAL OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION CERTIFICATION COMPLIANCE

JAN 2 9 2007

I, Mark W. Clark, certify and state that:

- I am the President of Elantic Telecom, Inc. ("Elantic") and have personal knowledge of Elantic's operating procedures as they relate to Customer Proprietary Network Information ("CPNI"), and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
- 2. I hereby certify that, to the best of my knowledge, information and belief, Elantic's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
- 3. A further statement outlining Elantic's operating procedures and compliance is attached as Exhibit A, as required by 47 C.F.R. §64.2009(e).

Mark Clark

President

January 22, 2007

Exhibit A

Statement of CPNI Procedures and Compliance

Elantic Telecom, Inc. ("Elantic") does not use or permit access to Customer Proprietary Network Information ("CPNI") to market any services outside of the total service approach as specified in 47 CFR §64.2005. If Elantic elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Elantic ensures that its employees do not improperly use or disclose CPNI by requiring that all access to CPNI be approved by a supervisor with knowledge of the FCC's CPNI requirements.

Elantic has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to CPNI. Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission.

Elantic maintains a record of all sales and marketing campaigns that use CPNI.

Elantic maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

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2006 Customer Proprietary Network Information Certification AN 2 9 2007

I, Edward B. Meyercord, III, Chief Executive Officer of Talk America Inc. have firsthand knowledge of the procedures that Talk America Inc. has implemented to combine the Federal Communications Commission's rules pertaining to safeguarding customer proprietary network information ("CPNI"). I certify that Talk America Inc. has established procedures that are adequate to comply with the Commission's CPNI rules set forth in section 64.2001 et seq. I relied on Attachment A in making this certification.

Signature

Chief Executive Officer

Title

DC01/KASHJ/244052.1

2006 Customer Proprietary Network Information Certification Attachment A

Talk America Inc. has established policies and procedures to comply with the Federal Communications Commission's ("FCC") rules pertaining to the use, disclosure, and access to customer proprietary network information ("CPNI") set forth in section 64.2001 et seq. Talk America Inc. has trained its personnel in the appropriate use of CPNI. Talk America Inc.'s handbook summarizes the appropriate use of CPNI and the disciplinary process in place for failure to use CPNI in accordance with Talk America Inc.'s policy.

In accordance with Talk America Inc.'s policy, Talk America Inc. does not use CPNI for any marketing purpose other than to market services to customers within the same category of service to which they already subscribe. For example, Talk America Inc. may contact the customer regarding extending the length of the customer's contract with Talk America Inc. Talk America Inc. also may use CPNI as required to render services and to bill for such services. Talk America Inc. does not share CPNI with affiliates or third parties.

ORIGINAL

2006 Customer Proprietary Network Information Certification

I, Edward B. Meyercord, III, Chief Executive Officer of LDMI Telecommunications, Inc. have firsthand knowledge of the procedures that LDMI Telecommunications, Inc. has implemented to comply with the Federal Communications Commission's rules pertaining to safeguarding customer proprietary network information ("CPNI"). I certify that LDMI Telecommunications, Inc. has established procedures that are adequate to comply with the Commission's CPNI rules set forth in section 64.2001 et seq. I relied on Attachment A in making this certification.

Signature

Chief Executive Officer

Title

1/19/07

Date

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2006 Customer Proprietary Network Information Certification Attachment A

LDMI Telecommunications, Inc. has established policies and procedures to comply with the Federal Communications Commission's ("FCC") rules pertaining to the use, disclosure, and access to customer proprietary network information ("CPNI") set forth in section 64.2001 et seq. LDMI Telecommunications, Inc. has trained its personnel in the appropriate use of CPNI. LDMI Telecommunications, Inc.'s handbook summarizes the appropriate use of CPNI and the disciplinary process in place for failure to use CPNI in accordance with LDMI Telecommunications, Inc.'s policy.

In accordance with LDMI Telecommunications, Inc.'s policy, LDMI Telecommunications, Inc. does not use CPNI for any marketing purpose other than to market services to customers within the same category of service to which they already subscribe. For example, LDMI Telecommunications, Inc. may contact the customer regarding extending the length of the customer's contract with LDMI Telecommunications, Inc. LDMI Telecommunications, Inc. also may use CPNI as required to render services and to bill for such services. LDMI Telecommunications, Inc. does not share CPNI with affiliates or third parties.

2006 Customer Proprietary Network Information Certification

I, Edward B. Meyercord, III, Chief Executive Officer of Network Telephone Corporation have firsthand knowledge of the procedures that Network Telephone Corporation has implemented to comply with the Federal Communications Commission's rules pertaining to safeguarding customer proprietary network information ("CPNI"). I certify that Network Telephone Corporation has established procedures that are adequate to comply with the Commission's CPNI rules set forth in section 64.2001 et seq. I relied on Attachment A in making this certification.

Signature

Chief Executive Officer

Title

1/19/07 Date **RECEIVED & INSPECTED**

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2006 Customer Proprietary Network Information Certification Attachment A

Network Telephone Corporation has established policies and procedures to comply with the Federal Communications Commission's ("FCC") rules pertaining to the use, disclosure, and access to customer proprietary network information ("CPNI") set forth in section 64.2001 et seq. Network Telephone Corporation has trained its personnel in the appropriate use of CPNI. Network Telephone Corporation's handbook summarizes the appropriate use of CPNI and the disciplinary process in place for failure to use CPNI in accordance with Network Telephone Corporation's policy.

In accordance with Network Telephone Corporation's policy, Network Telephone Corporation does not use CPNI for any marketing purpose other than to market services to customers within the same category of service to which they already subscribe. For example, Network Telephone Corporation may contact the customer regarding extending the length of the customer's contract with Network Telephone Corporation. Network Telephone Corporation also may use CPNI as required to render services and to bill for such services. Network Telephone Corporation does not share CPNI with affiliates or third parties.